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9 *Las Vegas Metropolitan Police Department,*
Joseph Lombardo, Jennifer Wood and
10 *Doris Hearrington (erroneously sued as Doris Hearrington)*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 CHARLES HAYES ,

14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.

17 Defendants.

Case No.: 2:20-cv-02048-KJD-BNW

STIPULATION TO STAY DISCOVERY
[ECF No. 17]

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19 Defendants Las Vegas Metropolitan Police Department, Joseph Lombardo, Jennifer
20 Wood, and Doris Hearrington (“LVMPD Defendants”), by and through their counsel, Kaempfer
21 Crowell, and Plaintiff Charles Hayes (“Plaintiff”), by and through his Counsel Na’Shaun L. Neal
22 of PLC Law Group, hereby stipulate as follows:

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1 1) Discovery shall be stayed pending ruling on the Plaintiff's Motion for
2 Multidistrict Litigation Treatment ("MDL Motion"), [ECF No. 20];

3 2) The discovery stay shall include all discovery including serving and responding to
4 any written discovery (e.g., Interrogatories, Requests for Production of Documents, Requests for
5 Admissions, Third-Party Subpoenas), taking any depositions, and the disclosure of any expert
6 and rebuttal expert reports.

7 3) The parties agree that the stay shall also extend to the deadline to file dispositive
8 motions.

9 4) The parties will submit a new proposed Discovery Plan to the Court within 14
10 days of a ruling on Plaintiff's MDL Motion and, upon the Court approving the Discovery Plan,
11 the stay will be lifted. The new Discovery Plan will include deadlines to amend pleadings,
12 designate experts, conduct discovery, and file dispositive motions.

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5) The stay is only affecting this instant case and has no bearing upon the Eastern District of California matter. *See Hayes v. Kern County*, 1:19-cv-0 1722-JLT.

DATED this 8th day of April, 2021.

KAEMPFER CROWELL

PLC LAW GROUP

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– AND –

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Attorneys for Plaintiff Charles Hayes

ORDER

IT IS ORDERED that on the basis of good cause the parties' stipulation is GRANTED. Discovery in this matter is STAYED pending a decision on plaintiff's motion for multidistrict litigation ("MDL") treatment. The deadline for dispositive motions is likewise stayed. And the parties' proposed discovery plan and scheduling order is due 14 days after a decision on plaintiff's MDL motion. Finally, this stay affects the instant case only.

IT IS FURTHER ORDERED that a joint status report concerning the status of the MDL motion is due on 7/13/2021 and every three months thereafter.

IT IS SO ORDERED

DATED: 12:22 pm, April 13, 2021

**BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE**